

THE HONORABLE ROBERT S. LASNIK

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

WILLETHA ALLISON, ALESHIA
ANDERSON, RASHAAD DANIELS,
LAMOUNT EVANS, SHAWN MAYER,
KION MCLEMORE, RAYMOND
MCNALLY, FRANCES VASQUE,
SHAKURA FELDER, AND WILLIAM
WIMBERLY, ON BEHALF OF
THEMSELVES AND ALL OTHERS
SIMILARLY SITUATED,

Plaintiffs,

v.

AMAZON.COM, INC.; INTEGRITY
STAFFING SOLUTIONS, INC.; AF
OPERATIONS, LLC; SMX, LLC; AND
DOES 1-50 JOINTLY AND
SEVERALLY,

Defendants.

No. 2:13-cv-01612-RSL

STIPULATED MOTION AND ORDER

NOTE FOR MOTION CALENDAR:
DECEMBER 4, 2013

Plaintiffs Willetha Allison, Aleshia Anderson, Rashaad Daniels, Lamount Evans, Shawn Mayer, Kion McLemore, Raymond McNalley, Frances Vasque, Shakura Felder, and William Wimberley (“Plaintiffs”) and Defendants Amazon.com, Inc. (“Amazon”), AF Operations LLC (“AF”), and SMX, LLC (“SMX,” and, collectively with Plaintiffs, Amazon, and AF, “the Parties”), by and through their respective counsel of record, after having met and conferred telephonically and by e-mail on November 20, 25, and 26, and December 2 and 3, 2013.

CERTIFICATE OF SERVICE (No. 2:13-cv-01612-RSL) – 1

PROPOSED SCHEDULE

The parties hereby jointly move the Court to schedule motion filing and briefing deadlines in this litigation as described below, in order to provide an orderly schedule for disposition of the various pending and future potential motions and to limit the possibility of duplicative and wasteful briefing, subject to the Court's approval. The Parties request the following motion filing and briefing schedule be set:

DATE	NATURE OF FILING
12/20/13	Plaintiffs' Second Amended Complaint
1/17/14	Defendants' deadline to Answer, Move, or otherwise Respond to the Second Amended Complaint
2/10/14	Defendants' deadline to Oppose Plaintiffs' Motion for Conditional Certification
2/14/14	Noting date and reply deadline for Plaintiffs' Motion for Conditional Certification filed on or before December 20, 2013

The purpose of this Stipulation and proposed Order is to afford the Plaintiffs the opportunity to file a Second Amended Complaint, set uniform schedules for all Defendants' briefing, and give the Court the opportunity to address certain threshold issues, including whether this case should remain pending in this jurisdiction, before Defendants are required to oppose Plaintiffs' Motion for Conditional Certification. The above schedule also will increase the likelihood that the Judicial Panel on Multidistrict Litigation will decide in connection with *In re Amazon*, MDL Case No. 2504, whether this case should be consolidated with numerous other cases raising similar issues and, if so, in what court.

This stipulation and the above briefing schedule are entered into without any of the Parties waiving their rights to file (i) any answer, motion, or other response to the Second Amended Complaint in advance of the January 17, 2014 deadline set forth above; (ii) any motion for relief from deadlines, including but not limited to relief from the deadlines set forth above; and (iii) any motion or other filing seeking or opposing equitable tolling.

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Defendant Integrity Staffing Solutions, Inc. has advised the Parties that it is not opposed to this Stipulated Motion, but because it asserts that the Court has no personal jurisdiction over it and that venue is not proper in this Court, it does not formally enter an appearance for the purposes of addressing this Stipulated Motion.

STIPULATED, AGREED AND CONSENTED TO BY:

BY: s/Jacob R. Rusch

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Attorneys for Plaintiffs

Dated: December 4, 2013

* admitted *pro hac vice*

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IT IS SO ORDERED.

Dated: December 6, 2013



The Honorable Robert S. Lasnik
United States District Court Judge

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